
State:	District of Columbia	Filing Company:	The Guardian Life Insurance Company of America
TOI/Sub-TOI:	H20G Group Health - Vision/H20G.000 Health - Vision		
Product Name:	2019-345 5/20 Group Vision Rate		
Project Name/Number:	2019-345 5/20 Group Vision Rate/2019-345-DC		

Filing at a Glance

Company:	The Guardian Life Insurance Company of America
Product Name:	2019-345 5/20 Group Vision Rate
State:	District of Columbia
TOI:	H20G Group Health - Vision
Sub-TOI:	H20G.000 Health - Vision
Filing Type:	Rate
Date Submitted:	01/10/2020
SERFF Tr Num:	GARD-132217153
SERFF Status:	Pending State Action
State Tr Num:	
State Status:	
Co Tr Num:	2019-345-DC
Implementation	05/01/2020
Date Requested:	
Author(s):	Heather Gulla, Michael Sullivan, Charlie Baumann, Krista Roberts, Julie Derks, Jane Neal, Jill McMullen, Kimberly Hoogenboom
Reviewer(s):	Darniece Shirley (primary), John Morgan
Disposition Date:	
Disposition Status:	
Implementation Date:	

State: District of Columbia **Filing Company:** The Guardian Life Insurance Company of America
TOI/Sub-TOI: H20G Group Health - Vision/H20G.000 Health - Vision
Product Name: 2019-345 5/20 Group Vision Rate
Project Name/Number: 2019-345 5/20 Group Vision Rate/2019-345-DC

General Information

Project Name: 2019-345 5/20 Group Vision Rate
Project Number: 2019-345-DC
Requested Filing Mode: Review & Approval
Explanation for Combination/Other:
Submission Type: New Submission
Group Market Type:
Filing Status Changed: 01/29/2020
State Status Changed:
Created By: Michael Sullivan
Corresponding Filing Tracking Number:

Status of Filing in Domicile: Not Filed
Date Approved in Domicile:
Domicile Status Comments:
Market Type: Group
Group Market Size: Small and Large
Overall Rate Impact: -1.7%
Deemer Date:
Submitted By: Michael Sullivan

Filing Description:

This rate filing is being submitted to your Department as file and use. All pertinent data has been entered into the appropriate fields and the appropriate documents have been attached to the Rate/Rule Schedule tab as well as the Supporting Documentation tab.

Below is a summary of the proposed Vision rate manual change(s) to be effective 5/1/2020:

- 2.0% decrease to VSP rates.
- 0.5% decrease to Davis rates.
- 2.0% decrease to Guardian Vision rates.

Please refer to the Actuarial Memorandum for details.

We appreciate the Department's time and consideration with respect to this filing.

Company and Contact

Filing Contact Information

Michael Sullivan, State Filing Analyst III
10 Hudson Yards
New York, NY 10001

michael_sullivan@glic.com
212-598-1944 [Phone]

Filing Company Information

The Guardian Life Insurance
Company of America
10 Hudson Yards
New York, NY 10001
(212) 598-8704 ext. [Phone]

CoCode: 64246
Group Code: 429
Group Name:
FEIN Number: 13-5123390

State of Domicile: New York
Company Type: Life
State ID Number:

Filing Fees

Fee Required? No
Retaliatory? No
Fee Explanation:

State:	District of Columbia	Filing Company:	The Guardian Life Insurance Company of America
TOI/Sub-TOI:	H20G Group Health - Vision/H20G.000 Health - Vision		
Product Name:	2019-345 5/20 Group Vision Rate		
Project Name/Number:	2019-345 5/20 Group Vision Rate/2019-345-DC		

Correspondence Summary

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Pending Industry Response	Darniece Shirley	01/28/2020	01/28/2020

Response Letters

Responded By	Created On	Date Submitted
Michael Sullivan	01/29/2020	01/29/2020

State: District of Columbia **Filing Company:** The Guardian Life Insurance Company of America
TOI/Sub-TOI: H20G Group Health - Vision/H20G.000 Health - Vision
Product Name: 2019-345 5/20 Group Vision Rate
Project Name/Number: 2019-345 5/20 Group Vision Rate/2019-345-DC

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	01/28/2020
Submitted Date	01/28/2020
Respond By Date	02/04/2020

Dear Michael Sullivan,

Introduction:

Thank you for submitting this filing. The State has some questions to help us better understand the filing. Please see below and respond accordingly.

Objection 1

- Actuarial Memorandum (Supporting Document)
- Actuarial Justification (Supporting Document)
- Actuarial Memorandum and Certifications (Supporting Document)
- VC-3-DC (May 2020), [] (Rate)
- VC-31-DC (May 2020), [] (Rate)

Comments: Please justify the trend based on an Actual Past Incurred Claims Analysis to produce the empirical basis of the trend factor utilized

Objection 2

- Actuarial Memorandum (Supporting Document)
- Actuarial Justification (Supporting Document)
- Actuarial Memorandum and Certifications (Supporting Document)
- VC-3-DC (May 2020), [] (Rate)
- VC-31-DC (May 2020), [] (Rate)

Comments: Please explain the expected loss ratio of 62.4%, given previous correspondence that the Company calculates the required change from actual experience. Please provide a detailed justification.

Conclusion:

Sincerely,
Darniece Shirley

State:	District of Columbia	Filing Company:	The Guardian Life Insurance Company of America
TOI/Sub-TOI:	H20G Group Health - Vision/H20G.000 Health - Vision		
Product Name:	2019-345 5/20 Group Vision Rate		
Project Name/Number:	2019-345 5/20 Group Vision Rate/2019-345-DC		

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	01/29/2020
Submitted Date	01/29/2020

Dear Darniece Shirley,

Introduction:

Please see our responses to your comments in the order in which they are presented:

Response 1

Comments:

Please see Exhibit III, Monthly Historical Trend under Supporting Documentation tab. This shows the per-employee-per-month claim cost on a monthly basis from Jan 2012 to Sept 2019. We observe that trend is cyclical and somewhat volatile over this period. We would note that the measurement of trend (that is, period-over-period ratio of PEPM claim costs) is affected by a negotiated reduction of claim fee schedules with vendor Davis that was effective 1/1/2018, and therefore biases the trend measurement downward for measurement periods in 2018 and 2019. Nonetheless, we observe trend spiking upwards over the latest several months. The selection of 2% is based on a combination of company data and actuarial judgment.

Related Objection 1

Applies To:

- VC-3-DC (May 2020), [] (Rate)
- VC-31-DC (May 2020), [] (Rate)
- Actuarial Memorandum (Supporting Document)
- Actuarial Justification (Supporting Document)
- Actuarial Memorandum and Certifications (Supporting Document)

Comments: Please justify the trend based on an Actual Past Incurred Claims Analysis to produce the empirical basis of the trend factor utilized

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Exhibit III - Monthly Historical Trend
Comments:	
Attachment(s):	Exhibit III - Monthly Historical Trend.xlsx

No Form Schedule items changed.

SERFF Tracking #:

GARD-132217153

State Tracking #:

Company Tracking #:

2019-345-DC

State: District of Columbia

TOI/Sub-TOI: H20G Group Health - Vision/H20G.000 Health - Vision

Product Name: 2019-345 5/20 Group Vision Rate

Project Name/Number: 2019-345 5/20 Group Vision Rate/2019-345-DC

Filing Company:

The Guardian Life Insurance Company of America

No Rate/Rule Schedule items changed.

Response 2

Comments:

The expected loss ratio of 62.4% is an aggregate loss ratio for our entire vision block. We calculate required change by each factor in our rate manual and analyze the actual experience. We then take a partial step towards the required change to minimize the impact to our inforce policyholders.

Related Objection 2

Applies To:

- VC-3-DC (May 2020), [] (Rate)
- VC-31-DC (May 2020), [] (Rate)
- Actuarial Memorandum (Supporting Document)
- Actuarial Justification (Supporting Document)
- Actuarial Memorandum and Certifications (Supporting Document)

Comments: Please explain the expected loss ratio of 62.4%, given previous correspondence that the Company calculates the required change from actual experience. Please provide a detailed justification.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Sincerely,

Michael Sullivan

State:	District of Columbia	Filing Company:	The Guardian Life Insurance Company of America
TOI/Sub-TOI:	H20G Group Health - Vision/H20G.000 Health - Vision		
Product Name:	2019-345 5/20 Group Vision Rate		
Project Name/Number:	2019-345 5/20 Group Vision Rate/2019-345-DC		

Rate Information

Rate data applies to filing.

Filing Method:	Review & Approval
Rate Change Type:	Decrease
Overall Percentage of Last Rate Revision:	-2.300%
Effective Date of Last Rate Revision:	11/01/2019
Filing Method of Last Filing:	Review & Approval
SERFF Tracking Number of Last Filing:	GARD-131998833

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
The Guardian Life Insurance Company of America	-1.700%	-1.700%	\$-20,553	236	\$1,208,973	-0.500%	-2.000%

State:	District of Columbia	Filing Company:	The Guardian Life Insurance Company of America
TOI/Sub-TOI:	H20G Group Health - Vision/H20G.000 Health - Vision		
Product Name:	2019-345 5/20 Group Vision Rate		
Project Name/Number:	2019-345 5/20 Group Vision Rate/2019-345-DC		

Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		VC-3-DC (May 2020)		New		VC-3-DC (May 2020).pdf,
2		VC-31-DC (May 2020)		New		VC-31-DC (May 2020).pdf,

THE GUARDIAN Life Insurance Company of America

Line 1B - VISION AREA FACTORS

State	Area Factors		Guardian
	VSP	Davis	
DC	0.903	0.877	0.849

THE GUARDIAN Life Insurance Company of America

Line 6 - PRIOR COVERAGE FACTORS

- a. Less than 10 employees 1.00
b. 10 or more employees:

	FACTOR		
	<u>VSP</u>	<u>DAVIS</u>	<u>GUARDIAN</u>
<u>Prior Coverage</u>			
No	1.000	1.000	1.000
Yes, with Davis	0.990	0.980	0.990
Yes, with VSP	0.980	0.990	0.990
Yes, with Avesis	0.990	0.990	0.980
Yes, with other (non VSP, non Davis)	0.990	0.990	0.990

Multiply the rate by this factor.

Line 7 - SECULAR TREND FACTOR

Effective Date	<u>VSP</u>	Davis <u>Designer</u>	Davis <u>Premier Platinum</u>	<u>Guardian</u>
2/1/20 - 3/31/20	1.0000	1.0000	1.0000	1.0000

VSP - Increase factor by 0.005 for each succeeding quarter through 1/31/2021.

Davis - Increase factor by 0.005 for each succeeding quarter through 1/31/2021.

Guardian - Increase factor by 0.005 for each succeeding quarter through 1/31/2021.

Line 7a - EXAM PLUS ALLOWANCE TREND

Effective Date	<u>VSP</u>	Davis <u>Designer</u>	Davis <u>Premier Platinum</u>	<u>Guardian</u>
2/1/20 - 3/31/20	1.0000	1.0000	1.0000	1.0000

VSP - Increase factor by 0.005 for each succeeding quarter through 1/31/2021.

Davis - Increase factor by 0.005 for each succeeding quarter through 1/31/2021.

Guardian - Increase factor by 0.005 for each succeeding quarter through 1/31/2021.

Line 7b - MATERIALS ONLY TREND

Effective Date	<u>VSP</u>	Davis <u>Designer</u>	Davis <u>Premier Platinum</u>	<u>Guardian</u>
2/1/20 - 3/31/20	N/A	1.0000	1.0000	1.0000

Davis - Increase factor by 0.005 for each succeeding quarter through 1/31/2021.

Guardian - Increase factor by 0.005 for each succeeding quarter through 1/31/2021.

Line 7c - EXAM PLUS TREND

Effective Date	<u>VSP</u>	Davis <u>Designer</u>	Davis <u>Premier Platinum</u>	<u>Guardian</u>
2/1/20 - 3/31/20	1.0000	1.0000	1.0000	1.0000

VSP - Increase factor by 0.005 for each succeeding quarter through 1/31/2021.

Davis - Increase factor by 0.005 for each succeeding quarter through 1/31/2021.

Guardian - Increase factor by 0.005 for each succeeding quarter through 1/31/2021.

State:	District of Columbia	Filing Company:	The Guardian Life Insurance Company of America
TOI/Sub-TOI:	H20G Group Health - Vision/H20G.000 Health - Vision		
Product Name:	2019-345 5/20 Group Vision Rate		
Project Name/Number:	2019-345 5/20 Group Vision Rate/2019-345-DC		

Supporting Document Schedules

Satisfied - Item:	Cover Letter
Comments:	
Attachment(s):	Cover Letter 5.20.pdf
Item Status:	
Status Date:	

Bypassed - Item:	Certificate of Authority to File
Bypass Reason:	N/A We are filing on our own behalf.
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Actuarial Memorandum
Comments:	
Attachment(s):	ACTMEMO-DC 202005.pdf
Item Status:	
Status Date:	

Bypassed - Item:	Actuarial Justification
Bypass Reason:	Rate filing. Actuarial Memorandum attached above.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	District of Columbia and Countrywide Loss Ratio Analysis (P&C)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	District of Columbia and Countrywide Experience for the Last 5 Years (P&C)
Comments:	
Attachment(s):	Experience-DC 202005.pdf
Item Status:	
Status Date:	

State:	District of Columbia	Filing Company:	The Guardian Life Insurance Company of America
TOI/Sub-TOI:	H20G Group Health - Vision/H20G.000 Health - Vision		
Product Name:	2019-345 5/20 Group Vision Rate		
Project Name/Number:	2019-345 5/20 Group Vision Rate/2019-345-DC		

Satisfied - Item:	Actuarial Memorandum and Certifications
Comments:	See Actuarial Memo and Actuarial Cert attached under Supporting Documentations tab
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Unified Rate Review Template
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Exhibit I
Comments:	
Attachment(s):	Exhibit I-DC 202005.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Actuarial Certification
Comments:	
Attachment(s):	ACTCERT-DC 202005.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Exhibit III - Monthly Historical Trend
Comments:	
Attachment(s):	Exhibit III - Monthly Historical Trend.xlsx
Item Status:	
Status Date:	

SERFF Tracking #:	GARD-132217153	State Tracking #:		Company Tracking #:	2019-345-DC
<hr/>					
State:	District of Columbia	Filing Company:	The Guardian Life Insurance Company of America		
TOI/Sub-TOI:	H20G Group Health - Vision/H20G.000 Health - Vision				
Product Name:	2019-345 5/20 Group Vision Rate				
Project Name/Number:	2019-345 5/20 Group Vision Rate/2019-345-DC				

Attachment Exhibit III - Monthly Historical Trend.xlsx is not a PDF document and cannot be reproduced here.



January 10, 2020

Mr. Laszlo Pentek
Actuary
Government of the District of Columbia
Department of Insurance, Securities and Banking
810 First Street, NE, #701
Washington, DC, 20002

Re: Group Vision Rate Filing
Carrier: The Guardian Life Insurance Company of America
NAIC Company Code: 64246

Dear Mr. Pentek:

Enclosed are the latest changes to Guardian's Group Vision rate manual with rate changes for 5/1/2020 or later upon approval of this filing. The requested changes result in a 1.7% decrease to our aggregate rate level.

The SERFF number of our last approved Vision filing is GARD-131998833.

As of 11/31/2019, The Guardian provides vision insurance for 236 groups located in the District of Columbia.

Sincerely,

Date

Lisa Knoble, ASA, MAAA
Actuarial Pricing Manager
Group Products

ACTUARIAL MEMORANDUM

A. Description of Benefits

The Guardian has one class of business. In addition to benefit plan design, Guardian's Group Vision rates are adjusted based on industry, family composition, geographical area, and group size (lives and premium). There is no limit to the issue age range. The rating area is based on the state of the employer and the industry factors are based on the SIC code of the employer. We currently utilize a four-tier rate structure (Employee; Employee and Spouse; Employee and Child(ren); Employee, Spouse and Child(ren)).

Currently, Guardian's Group Vision rate manual can be used to calculate rates for a wide variety of Vision benefit plan designs for groups of 2 or more employees. Plan design options include varying levels of coverage for service and materials, with the choice of split or single copays.

B. Renewability Provision

Each case's rates are reviewed for renewal action on an annual basis. Renewal rate cap and 2-year rate guarantee options are also available.

C. Applicability (Closed/Open Block)

Guardian's Vision business is an open block.

D. Marketing Method

Guardian's Vision business is marketed through both our field force of agents and general agents as well as by brokers.

E. Underwriting Method

Underwriting is at the group level. Group characteristics and prior experience determine the level of underwriting. The plan holder's rates may be modified by underwriting review.

F. Issue Age Limits

There is no limit to the issue age range, and the premiums are determined on an attained age basis, since they change each year as the case renews.

G. Premium Basis

Rates are developed separately for "employee" and "dependent" categories. These categories are then split into "tier" rates based on factors that were developed using internal company data.

H. Nature of Rate Change and Proposed Rate/Methodology Change

Below is a summary of the proposed Vision rate manual change(s) to be effective on May 1, 2020:

For Plans Utilizing the VSP Network:

- 1. Vision Area Factors (Line 1B, VC-3-DC):** Area factors were adjusted based on experience and to accommodate the resetting of the Secular Trend Factor in Line 7. The overall effect on rates is a 1.0% decrease in the District of Columbia.
- 2. Secular Trend (Line 7, VC-31-DC)** has been reset to 1.00 as of 2/1/2020. The factor was previously 1.01 as of 1/1/20. This factor is scheduled to increase by 0.005 for each of the next four quarters starting from 4/1/2020. The aggregate effect on rates is a 1.0% decrease in the District of Columbia.

The combined effect of these changes is a 2.0% decrease to VSP rates in the District of Columbia.

For Plans Utilizing the Davis Vision Network:

- 1. Vision Area Factors (Line 1B, VC-3-DC):** Area factors were adjusted based on experience and to accommodate the resetting of the Secular Trend Factor in Line 7. The overall effect on rates is a 0.5% increase in the District of Columbia.
- 2. Secular Trend (Line 7, VC-31-DC)** has been reset to 1.00 as of 2/1/2020. The factor was previously 1.01 as of 1/1/20. This factor is scheduled to increase by 0.005 for each of the next four quarters starting from 4/1/2020. The aggregate effect on rates is a 1.0% decrease in the District of Columbia.

The combined effect of these changes is a 0.5% decrease to Davis rates in the District of Columbia.

For Plans Utilizing the Guardian Vision Network:

- 1. Vision Area Factors (Line 1B, VC-3-DC):** Area factors were adjusted based on experience and to accommodate the resetting of the Secular Trend Factor in Line 7. The overall effect on rates is a 1.0% decrease in the District of Columbia.
- 2. Secular Trend (Line 7, VC-31-DC)** has been reset to 1.00 as of 2/1/2020. The factor was previously 1.01 as of 1/1/20. This factor is scheduled to increase by 0.005 for each of the next four quarters starting from 4/1/2020. The aggregate effect on rates is a 1.0% decrease in the District of Columbia.

The combined effect of these changes is a 2.0% decrease to Guardian Vision rates in the District of Columbia.

The overall effect of these changes is a 1.7% decrease to Vision rates in the District of Columbia.

I. Indication if New or Modified

This is a new filing for the District of Columbia.

J. Comparison to Status Quo

These changes result in a 1.7% aggregate decrease to DC premium vision rates.

K. Summary of How Each Proposed Modification Differs from Corresponding Current/Approved Rate/Methodology

Please see section H above.

L. Summary of Each Proposed New Rule

We are not requesting any rule changes.

M. Overall Premium Impact of Filing on DC Policy holders

These changes result in a \$20,553 aggregate decrease to DC premium rates.

N. Rate Change History

Date	VSP % Change	Davis % Change	Guardian Vision % Change
1/1/2014	1.000%	0.813%	
1/1/2014	2.600%	4.800%	
4/1/2014	1.000%	0.813%	
7/1/2014	1.000%	0.813%	
10/1/2014	1.000%	0.813%	
10/1/2014	-1.650%	-1.740%	
2014 Total:	5.004%	7.231%	
1/1/2015	1.000%	0.813%	
4/1/2015	1.000%	0.813%	
5/1/2015	-2.400%	-1.700%	
7/1/2015	1.000%	0.813%	
10/1/2015	1.000%	0.813%	
2015 Total:	1.563%	1.536%	
1/1/2016	1.000%	0.813%	

2/1/2016	1.450%	1.280%	
4/1/2016	1.000%	0.813%	
5/1/2016	-1.000%	-2.000%	
7/1/2016	1.000%	0.813%	
10/1/2016	1.000%	0.813%	
2016 Total:	4.514%	2.522%	
1/1/2017	1.000%	0.813%	
4/1/2017	1.000%	0.813%	
6/1/2017	-1.210%	1.000%	
7/1/2017	1.000%	1.000%	
10/1/2017	1.000%	1.000%	
2017 Total:	2.801%	4.712%	
1/1/2018	0.594%	0.631%	0.634%
2/1/2018	-1.190%	-0.210%	-0.700%
4/1/2018	0.591%	0.627%	0.630%
7/1/2018	-3.500%	-2.400%	-2.400%
10/1/2018	0.602%	0.632%	0.635%
11/1/2018	-4.989%	-5.043%	-5.043%
2018 Total:	-7.777%	-5.758%	-6.212%
1/1/2019	0.610%	0.640%	0.643%
4/1/2019	0.606%	0.636%	0.639%
5/1/2019	0.000%	0.000%	-5.000%
7/1/2019	0.500%	0.500%	0.500%
10/1/2019	0.498%	0.498%	0.498%
11/1/2019	-0.700%	-6.700%	-5.400%
2019 Total:	1.516%	-4.561%	-8.064%
1/1/2020	0.500%	0.500%	0.500%
4/1/2020	0.498%	0.498%	0.498%
5/1/2020	-2.000%	-0.500%	-2.000%
2020 Total	-1.020%	0.495%	-1.020%

O. Filed Minimum Required Loss Ratio

Guardian's Group Vision manually rated business is priced with an expected loss ratio of 62.4%. The remaining 37.6% is intended to provide for expenses and profit. This assumes case sizes of 2-499, which is the majority of the business receiving manual rates. Below is the breakdown of the expense assumptions:

Commissions	10.9%
Other Marketing Expenses	2.8%
Administration	12.6%
Taxes	6.6%
<u>Profit</u>	<u>4.7%</u>
Total	37.6%

P. Interest Rate Assumptions

We do not have interest rate assumption due to the short-term nature of the Vision product.

Q. Trend Assumptions

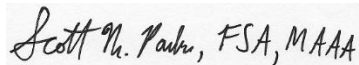
The prospective annual trend assumption is 2.0%.

R. Persistency

The Guardian's product is an annually renewable term product and therefore no persistency assumption is incorporated into the pricing.

S. Actuarial Certification

Please see the attached certification.



Scott M. Parker, FSA, MAAA
Director and Associate Actuary
Group Products

12/30/2019
Date

DC - VSP		Period: 10/1/18 - 9/30/19				State Rate Filing Data	
CaseSize		Case Count	Employees	Earned Premium	Incurred Claims	Loss Ratio	
2-9		70	344	\$60,728	\$23,109		38.1%
10-15		17	203	\$38,412	\$18,489		48.1%
16-49		50	1,404	\$205,109	\$114,090		55.6%
50-99		12	802	\$150,826	\$74,781		49.6%
100-249		4	643	\$96,047	\$43,242		45.0%
250+		6	3,034	\$395,758	\$206,108		52.1%
Grand Total		159	6,430	\$946,880	\$479,819		50.7%

DC - Davis		Period: 10/1/18 - 9/30/19				State Rate Filing Data	
CaseSize		Case Count	Employees	Earned Premium	Incurred Claims	Loss Ratio	
2-9		21	110	\$18,480	\$6,745		36.5%
10-15		14	168	\$22,597	\$9,189		40.7%
16-49		17	486	\$56,219	\$25,108		44.7%
50-99		5	364	\$48,063	\$16,039		33.4%
100-249		1	122	\$13,193	\$6,244		47.3%
250+		1	256	\$42,786	\$15,211		35.6%
Grand Total		59	1,506	\$201,338	\$78,536		39.0%

DC - Guardian Vision		Period: 10/1/18 - 9/30/19				State Rate Filing Data	
CaseSize		Case Count	Employees	Earned Premium	Incurred Claims	Loss Ratio	
2-9		4	18	\$1,574	\$584		37.1%
10-15		2	27	\$2,411	\$1,091		45.3%
16-49		7	205	\$20,682	\$8,866		42.9%
50-99		5	356	\$21,747	\$5,591		25.7%
100-249		0	0	\$14,342	\$5,993		41.8%
250+		18	606	\$60,756	\$22,125		36.4%
Grand Total		36	1,212	\$121,512	\$44,250		36.4%

Nationwide - VSP		Period: 10/1/18 - 9/30/19				State Rate Filing Data	
CaseSize		Case Count	Employees	Earned Premium	Incurred Claims	Loss Ratio	
2-9		13,499	61,511	\$10,226,138	\$4,679,234		45.8%
10-15		4,050	49,572	\$7,795,544	\$3,723,044		47.8%
16-49		7,442	209,006	\$31,874,137	\$16,217,437		50.9%
50-99		2,835	197,542	\$29,874,323	\$16,385,271		54.8%
100-249		1,916	290,017	\$42,474,333	\$24,953,479		58.7%
250+		715	419,764	\$60,631,653	\$37,755,849		62.3%
Grand Total		30,457	1,227,412	\$182,876,128	\$103,714,314		56.7%

Nationwide - Davis		Period: 10/1/18 - 9/30/19				State Rate Filing Data	
CaseSize		Case Count	Employees	Earned Premium	Incurred Claims	Loss Ratio	
2-9		3,492	16,930	\$2,348,727	\$1,129,717		48.1%
10-15		1,428	17,568	\$2,204,033	\$1,056,412		47.9%
16-49		3,447	99,702	\$12,339,139	\$6,253,467		50.7%
50-99		1,412	97,641	\$11,819,626	\$6,261,210		53.0%
100-249		792	117,494	\$13,851,143	\$7,823,714		56.5%
250+		241	133,638	\$15,936,059	\$9,498,896		59.6%
Grand Total		10,812	482,973	\$58,498,727	\$32,023,416		54.7%

Nationwide - Guardian Vision		Period: 10/1/18 - 9/30/19				State Rate Filing Data	
CaseSize		Case Count	Employees	Earned Premium	Incurred Claims	Loss Ratio	
2-9		573	2,934	\$285,173	\$108,312		38.0%
10-15		247	3,022	\$266,700	\$101,931		38.2%
16-49		607	17,311	\$1,681,816	\$646,331		38.4%
50-99		254	17,747	\$1,654,928	\$647,679		39.1%
100-249		109	16,646	\$1,520,878	\$675,991		44.4%
250+		35	21,642	\$1,749,353	\$950,638		54.3%
Grand Total		1,825	79,302	\$7,158,848	\$3,130,882		43.7%

EXHIBIT I
District of Columbia

District of Columbia Total Experience

Year	Case Count	Lives	Earned Premium	Incurred Claims	Loss Ratio
2015	140	5,086	\$701,005	\$339,236	48.4%
2016	176	6,537	\$921,229	\$451,173	49.0%
2017	209	7,742	\$1,053,563	\$547,497	52.0%
2018	222	7,934	\$1,127,067	\$529,332	47.0%
10/1/2018 - 9/30/2019	254	9,148	\$1,269,730	\$602,605	47.5%

Valuation Date: 9/30/2019

Case Sizes: 2+

District of Columbia VSP Experience

Year	Case Count	Lives	Earned Premium	Incurred Claims	Loss Ratio
2015	96	3,378	\$517,219	\$261,802	50.6%
2016	118	4,026	\$618,414	\$306,990	49.6%
2017	140	5,640	\$796,677	\$415,176	52.1%
2018	148	5,979	\$889,278	\$439,376	49.4%
10/1/2018 - 9/30/2019	159	6,430	\$946,880	\$479,819	50.7%

Valuation Date: 9/30/2019

Case Sizes: 2+

District of Columbia Davis Experience

Year	Case Count	Lives	Earned Premium	Incurred Claims	Loss Ratio
2015	44	1,708	\$183,786	\$77,434	42.1%
2016	58	2,511	\$302,815	\$144,183	47.6%
2017	68	2,006	\$256,233	\$132,321	51.6%
2018	61	1,348	\$199,229	\$77,011	38.7%
10/1/2018 - 9/30/2019	59	1,506	\$201,338	\$78,536	39.0%

Valuation Date: 9/30/2019

Case Sizes: 2+

District of Columbia Guardian Vision Experience

Year	Case Count	Lives	Earned Premium	Incurred Claims	Loss Ratio
2015	N/A	N/A	N/A	N/A	N/A
2016	N/A	N/A	N/A	N/A	N/A
2017	1	96	\$653	\$0	0.0%
2018	13	607	\$38,560	\$12,945	33.6%
10/1/2018 - 9/30/2019	36	1,212	\$121,512	\$44,250	36.4%

Valuation Date: 9/30/2019

Case Sizes: 2+

Nationwide

Nationwide Total Experience

Year	Case Count	Lives	Earned Premium	Incurred Claims	Loss Ratio
2015	31,623	1,462,189	\$186,677,000	\$113,188,000	60.6%
2016	37,013	1,536,532	\$209,668,751	\$124,611,156	59.4%
2017	39,423	1,640,858	\$226,581,253	\$133,099,610	58.7%
2018	40,665	1,713,647	\$238,188,399	\$134,473,821	56.5%
10/1/2018 - 9/30/2019	41,710	1,753,651	\$241,574,233	\$135,677,854	56.2%

Valuation Date: 9/30/2019

Case Sizes: 2+

Nationwide VSP Experience

Year	Case Count	Lives	Earned Premium	Incurred Claims	Loss Ratio
2015	22,402	941,354	\$136,182,757	\$81,780,473	60.1%
2016	24,909	1,015,416	\$150,144,483	\$88,560,224	59.0%
2017	26,570	1,100,126	\$164,733,281	\$95,729,851	58.1%
2018	28,301	1,164,814	\$174,869,632	\$100,174,767	57.3%
10/1/2018 - 9/30/2019	30,457	1,227,412	\$182,876,128	\$103,714,314	56.7%

Valuation Date: 9/30/2019

Case Sizes: 2+

Nationwide Davis Experience

Year	Case Count	Lives	Earned Premium	Incurred Claims	Loss Ratio
2015	10,336	460,683	\$50,597,550	\$30,843,431	61.0%
2016	11,135	513,850	\$57,729,035	\$36,375,700	63.0%
2017	11,734	535,048	\$61,121,098	\$37,468,194	61.3%
2018	11,303	509,776	\$60,468,535	\$33,108,127	54.8%
10/1/2018 - 9/30/2019	10,812	482,973	\$58,498,727	\$32,023,416	54.7%

Valuation Date: 9/30/2019

Case Sizes: 2+

Nationwide Guardian Vision Experience

Year	Case Count	Lives	Earned Premium	Incurred Claims	Loss Ratio
2015	N/A	N/A	N/A	N/A	N/A
2016	N/A	N/A	N/A	N/A	N/A
2017	1	2	\$15,754	\$11,901	75.5%
2018	1,061	39,057	\$2,850,231	\$1,190,926	41.8%
10/1/2018 - 9/30/2019	1,825	79,302	\$7,158,848	\$3,130,882	43.7%

Valuation Date: 9/30/2019

Case Sizes: 2+



ACTUARIAL CERTIFICATION

In my opinion the premium rates and rating methodology to which this certification applies are neither excessive, inadequate, nor unfairly discriminatory, and they meet the requirements of the insurance laws and regulations of the District of Columbia.

Scott M. Parker, FSA, MAAA

Scott M. Parker, FSA, MAAA
Director and Associate Actuary
Group Products

12/30/19

Date